

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	RM-10781
Amendment of Part 97 of the Commission's)	RM-10782
Amateur Radio Service Rules to Eliminate)	RM-10783
Morse Code Proficiency Testing Requirements)	RM-10784
For All Classes of Amateur Licenses)	RM-10785
)	RM-10786
To: The Commission)	RM-10787

Additional Comments Of Curtis Robison

I would like to add to my earlier posted comments. After reviewing the various requests for rule making fillings, reading many of the comments posted to date, discussion with other amateur radio operators in my area, and considering the wide range of opinions and feelings on these topics I have come to the conclusion that this issue breaks down in to several different view points that no matter what is decided there will be people unhappy with the outcome.

Many good points are made both for and against removing the testing requirement for Morse code. The arguments range across the board from one extreme to the other. There have been proposals put forward to remove Morse code entirely to going back to the older style of graduated testing with increasing levels for each class of license. There have been comments made that the written test should also under go changes. There have been proposals that there should be changes made to operating frequencies and privileges of the various classes.

What I would like to have you consider is a fairly straight forward proposal that could be a fair compromise between all the various camps of opinion that are out there on this topic.

1. Streamline the classes of operator privileges to only 3 classes, those being Technician, General, and Extra. This would involve the gradual phasing out of all other classes of license holder where they would be required to transition to whichever class of license that they qualify for at the time of their next renewal. This would in time result in much less confusion as to the different types of licenses and make the work of the FCC much easier to maintain the database with only the three classes of license holder.

2. Graduated testing for each of the classes of license with the following as a rough guideline:
 - a. Technician: Written test covering basic technical topics, rules and regulations and operating procedures.
 - b. General: Written test covering more advanced technical topics, more coverage of rules and regulations and additional operating procedures
 - c. Extra: Morse code testing at 5 words per minutes both send and receive, along with a written test on more advanced technical topics, rules and regulations, and operating procedures.
3. With the elimination of the current testing requirement I would propose that no additional privileges be granted without passing the requirements of the testing structure as listed in item #2. In other words, if currently a technician license holder they would still be required to take the general test to move into the HF bands and not granting them the Technician Plus type privileges as so many have proposed. Those who have privileges as a Tech Plus would retain them until the next renewal time where they would then have the choice to drop to the straight technician level or pass the general written test to move up.
4. I propose absolutely no changes in the current band plans, leave the morse code sub-bands as they are, therefore protecting the band space for those that do enjoy operations in that mode.

These changes as outlined above are a reasonable compromise between the various viewpoints that have been presented from both extremes of this topic. It provides for those that are not in favor of Morse code the chance to move up into the HF bands while at the same time protecting the tradition and prestige of those that are willing to take the time to learn Morse code to move all the way up to Extra class. The changes in the written test can be phased in as each test is re-evaluated to insure the proper level of knowledge required for qualified operators at each level. This would then serve to protect the amateur service from being degraded by under qualified persons from entering the various license classes. As a further point to maintain the higher level of operation to insure that the amateur service does not spiral down to the level of citizen's band as many fear it might also be considered that a license holder would have to retest for their license at each renewal time.

Thank you for taking the time to consider my comments.

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